BEFORE THE PUBLIC UTILITIES COMMISSION OF THE F I L E C STATE OF CALIFORNIA 11-03-06 01:56 PM

Order Instituting Rulemaking Regarding the Implementation of the Suspension of Direct Access Pursuant to Assembly Bill 1x and Decision 01-09-060.

Rulemaking 02-01-011

WORKING GROUP PARTIES' JOINT PETITION FOR MODIFICATION OF DECISION 06-07-030, OPINION REGARDING DIRECT ACCESS AND DEPARTING LOAD COST RESPONSIBILITY SURCHARGE OBLIGATIONS

MICHAEL D. MONTOYA JANET S. COMBS

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-1524

Facsimile: (626) 302-7740

E-mail: Janet.Combs@SCE.com

On behalf of the Working Group Parties:

Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, The Utility Reform Network, Alliance for Retail Energy Markets, California Large Energy Consumers Association, City of Rancho Cucamonga, City of Corona, South San Joaquin Irrigation District, California Manufacturers & Technology Association

Dated: November 3, 2006

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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I. INTRODUCTION

Pursuant to Rule 16.4 of the California Public Utilities Commission's (Commission)
Rules of Practice and Procedure, Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), The Utility
Reform Network, the Alliance for Retail Energy Markets, California Large Energy Consumers
Association, City of Rancho Cucamonga, City of Corona, South San Joaquin Irrigation
District, California Manufacturers & Technology Association (collectively, the Working Group
Parties) jointly file this Petition for Modification of Decision 06-07-030, Opinion Regarding
Direct Access and Departing Load Cost Responsibility Surcharge Obligations, issued July 20,
2006 (the Decision). The Decision resolved various outstanding issues related to the cost
responsibility surcharge (CRS) methodology applicable to non-bundled customers, including
Direct Access (DA) and Municipal Departing Load (MDL) customers within the territories of
the investor-owned utilities (IOUs). For reasons discussed herein, the Working Group Parties
request that the Commission modify the Decision to:

1. Adopt Resource Adequacy Generation Capacity (RA/capacity) adders for 2007 of \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E, based on the consensus of the Working Group Parties, and remove erroneous statements that the Working Group Parties agreed to base the RA/capacity adders on the annual capital costs of a combustion turbine;

¹ This Joint Petition for Modification addresses only the specific subject matter identified herein, and the Working Group Parties expressly reserve their rights with respect to all other CRS issues, including billing and collection issues.

- 2. Adopt line loss factors of 6.0% for PG&E and 5.3% for SCE for use in the 2007 market benchmark calculation. These line loss factors have been agreed to by the Working Group Parties;
- 3. Modify the calculation of the price benchmark for 2007 to reflect the availability of published prices for both on-peak and off-peak future power deliveries; and
- 4. Modify Table 3C of the Decision for SCE and SDG&E as shown in **Attachment A**, and adopt the results in Modified Table 3C for 2003 2006 for SCE, and 2006 for SDG&E, as the CRS applicable to MDL customers not exempt from the DWR Power Charge component of the CRS.²

II. <u>DISCUSSION</u>

A. The Decision Should be Modified to Adopt the Working Group Parties' Consensus on 2007 Generation Capacity Adder Values

In adopting a forecast market price benchmark methodology for calculating the Indifference Rate, the Decision acknowledged the need for a RA/capacity adder to capture the cost of complying with resource adequacy requirements.³ The Decision stated that no capacity market is presently available to provide transparent RA/capacity adders.⁴ Thus, for 2006 the Decision adopted the parties' consensus for RA/capacity cost adders, which were negotiated as part of the workshop report discussions.⁵ For 2007 and beyond, the Decision directed the Energy Division to coordinate a meeting of the Working Group to discuss RA/capacity adders based on publicly reported transactions in a California capacity market or another suitable public index once available.⁶

On August 7, 2006, the Energy Division convened the Working Group to discuss RA/capacity adders for 2007 and beyond. Follow-up calls were held on August 16 and 18, 2006. The Working Group Parties acknowledged that RA/capacity adders would need to be negotiated for 2007, as there is no capacity market yet available to provide transparent values, and the IOUs require 2007 RA/capacity adders by November 2006 to file advice letters or updates to their Energy Resource Recovery Account (ERRA) filings to establish the Indifference Rate for 2007, as well as the Power Charge Indifference Adjustment (PCIA) and Ongoing Competition Transition Charge (CTC) components of the CRS. Accordingly, the

⁵ See id. at p. 12 and Ordering Paragraph 3.

² PG&E will file a separate petition to modify the Decision with respect to Table 3C as it applies to PG&E.

³ See the Decision, mimeo at pp. 10-13 and Finding of Fact 12.

⁴ See id. at p. 8-9.

⁶ See the Decision, mimeo at pp. 12 and OP 4.

Working Group Parties reached the following consensus for 2007 RA/capacity adders: \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E.

The Working Group Parties have also agreed to resume discussion in the summer of 2007 to determine the RA/capacity adders for 2008 and beyond. If a functioning and transparent capacity market or a suitable public index becomes available, the Working Group Parties will recommend, for 2008 and beyond, a RA/capacity adder based on such a market or public index. Otherwise, the RA/capacity adder will continue to be determined based on the Working Group Parties' consensus until such market or public index becomes available.

Given the present lack of transparent RA/capacity adders, and the IOUs' need to incorporate RA/capacity adders in their November 2006 filings to establish the 2007 Indifference Rate, PCIA and CTC, the Decision should be modified adopt the Working Group Parties' consensus for the 2007 RA/capacity adders of \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E. To effectuate the requested modification, the Working Group Parties recommend the following changes to the Decision:

At page 12 of the Decision, Section II.B.2:

"For 2006, we adopt the parties' consensus for a RA/capacity cost adder of \$8/MWh for SCE and \$4/MWh for PG&E, and for 2007, \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E, which will be added to the average strip price."

At Ordering Paragraph 3:

"For 2006, the Resource Adequacy Generation Capacity (RA/capacity) cost adder will be \$8/megawatt-hours (MWh) for SCE and \$4/MWh for PG&E, and for 2007, \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E, which will be added to the average strip price."

The Working Group Parties further request that the Decision be modified to eliminate any statements that the Working Group Parties agreed to base the RA/capacity adders on the annual capital costs of a combustion turbine (CT), since the Working Group Parties never reached such agreement. Accordingly, the Decision should be modified as follows:

At page 8 of the Decision:

"Parties also agree that a Resource Adequacy/Generation Capacity ("RA/capacity") cost adder should be incorporated for each IOU, based on the annual capital costs for a combustion turbine."

At Appendix 1, Fourth Bullet:

"Add a capacity/resource adequacy adjustment to the forward NP15/SP15 futures prices.—The capacity/resource adequacy adder shall equal the annual carrying cost of a combustion turbine, as reported in the CEC's *Comparative Cost of California Central Station Electricity Generation Technologies*, (June 2003, CEC report 100-003-01), Appendix D, adjusted for inflation. Using the Bureau of Economic Analysis' implicit price deflator for gross domestic product (as reported in the EIA's *Annual Energy Outlook* Table 1.1.9), the 2005 capacity/resource adequacy adder equals \$9.44/MWh."

B. The Decision Should be Modified to Reflect the Availability of More Complete Published Futures Prices for the Benchmark Used in Calculating the Indifference Charge

The Decision's Adopted Procedure for Deriving Market Benchmark, set forth in Appendix 1, states that average published prices for future delivery of power will be multiplied "by .87 to account for the fact that the benchmark is effectively for baseload power while the future price assumes a 6x16 product." Since the adoption of the Decision, futures prices for off-peak hours for the coming year have begun to be published. Therefore, it is appropriate to modify the procedure to incorporate published on-peak and off-peak power prices, with the average price based on a weighted average of on-peak and off-peak prices. Such a modification is both appropriate and consistent with the intent of the Working Group to recommend a procedure that maximizes use of published data.

To effectuate this modification, the Working Group Parties recommend that footnote 12 of the Decision be eliminated in its entirety as no longer necessary, and that the first sentence of the first bullet point on Page 1 of Appendix 1 be amended as follows:

"Use an <u>weighted</u> average of Megawatt Daily published market indices for a one-year strip of <u>on-peak and off-peak</u> power prices for the coming calendar year for NP15 and SP15 published over the period October 1 through October 31 of the year prior to that being considered; <u>the weighting will be done by the number of on-peak and off-peak</u> hours in the particular year."

C. The Decision Should be Modified to Adopt Line Loss Factors for SCE and PG&E for the Market Price Benchmark Calculation for 2007

The Decision's Adopted Procedure for Deriving Market Benchmark, set forth in Appendix 1, adjusts the sum of average strip price and the RA/capacity adder for line losses to ensure that the benchmark reflects the same average line losses that are inherent in the delivered power prices, keeping the comparison of the portfolio prices to the market price

benchmark consistent.⁷ The Decision noted that line loss values had not yet been agreed upon by the Working Group Parties, but were estimated to range from 6.0%-8.5% for PG&E, 5.3%-8.4% for SCE, and 4.3% for SDG&E.⁸

At the Working Group meetings convened on August 7, 16 and 18, 2006, the Working Group Parties discussed the line loss factors for SCE and PG&E, and agreed that the lower range of the estimates contained in the Decision for line loss factors should be used in the 2007 market price benchmark calculation; specifically, 6.0% for PGE and 5.3% for SCE.

Accordingly, the Working Group Parties request that the Decision be modified to adopt a line loss factor of 6.0% for PGE and 5.3% for SCE for the 2007 market price benchmark calculation. To effectuate this modification, the Working Group Parties recommend that Appendix 1 be revised as follows:

"Adjust for line losses. The portfolio prices against which the benchmark will be measured are at the customer meter. Therefore, to keep the comparison consistent, the benchmark shall reflect the same average line losses that are inherent in the delivered power prices. These values have not yet been agreed upon by the Working Group as follows: Lines loss estimates range from 6.0% - 8.5% for PG&E, 5.3%-8.4% for SCE, and 4.3% for SDG&E."

D. <u>Table 3C of the Decision Should be Modified for SCE and SDG&E as Shown in Attachment A Hereto and the Calculations for 2003 – 2006 for SCE and 2006 for SDG&E in Modified Table 3C Should be Adopted as the CRS Applicable to MDL Customers Not Exempt from the DWR Power Charge</u>

The Decision, in Appendix 6, included in Table 3C the results of the Working Group Parties' calculations of MDL CRS obligations (both actual and illustrative) for years 2003 – 2011. The Working Group Parties recommend that the Table 3C be modified for SCE and SDG&E as shown in Modified Table 3C **Attachment A** hereto, which contains the following revisions:

- 1. A notation of "Adopted" CRS calculations has been added for years 2003 2006 for SCE, and for 2006 for SDG&E;
- 2. A notation of "Illustrative" CRS calculations has been added for years 2007 2011;
- 3. Footnote has been added to clarify that the Commission did not adopt a 2003 CTC for SCE. The 2004 2006 CTC is the annual system average.

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⁷ See Appendix 1, at bullet point "Adjust for line losses."

⁸ See id.

- 4. Certain CTC results have been revised:
 - a. SCE's 2004 and 2005 CTC have been revised because the CTC values shown in Table 3C of the Decision are those applicable to DA customers who mostly consist of large commercial and industrial customers. The system average CTC is more appropriate to apply to MDL customers because the MDL customer mix is similar to SCE's bundled customer mix.
 - b. SDG&E's 2006 CTC has been revised.
 - c. Similar to Table 3C in the Decision, in Modified Table 3C, the CTC for SCE and SDG&E for 2007 2011 is the same as the revised 2006 CTC, and is included only as an illustrative figure.
- 5. MDL Power Charges have also been revised for the following reasons:
 - a. SCE's 2004 and 2005 MDL Power Charges have been revised to reflect the change in the CTC.
 - b. SDG&E's 2006 MDL Power Charge has been revised to reflect the change in the CTC.

An SCE MDL CRS billing sample based upon Modified Table 3C is attached hereto as **Attachment B**. The SCE billing sample is intended to clarify how SCE's MDL CRS accrual rates are applied.

To effectuate the requested modification of Table 3C, the Working Group Parties recommend that Modified Table 3C and the SCE billing sample be included in Appendix 6 of the Decision, and that the Decision include the following revisions:

On page ii:

Add "Appendix 6: Departing Load Obligations" at the end of the list of appendices.

On page 30, Section III.B.2:

Add the following sentence at the end of the paragraph: "We adopt the results of Working Group Parties' CRS calculations for 2003 – 2006 for SCE, and 2006 for SDG&E, set forth in Modified Table 3C of Appendix 6, as the CRS applicable to MDL customers not exempt from the DWR Power Charge."

At Ordering Paragraph 19:

Add the following sentence at the beginning: "For 2003 – 2006 for SCE, and 2006 for SDG&E, the CRS obligations of MDL customers not exempt from the DWR Power Charge are set forth in Modified Table 3C of Appendix 6."

III. CONCLUSION

For the foregoing reasons, the Working Group Parties respectfully request that the Decision be modified consistent with the recommendations herein to:

- Adopt Resource Adequacy Generation Capacity adders for 2007 of \$7/MWh for SCE and SDG&E, and \$4/MWh for PG&E, based on the consensus of the Working Group Parties;
- Adopt line loss factors of 6.0% for PG&E and 5.3% for SCE for use in the 2007 market benchmark calculation. These line loss factors have been agreed to by the Working Group Parties;
- Modify the calculation of the price benchmark for 2007 to reflect the availability of published prices for both on-peak and off-peak future power deliveries; and
- Include Modified Table 3C and the SCE billing sample in Appendix 6 of the Decision, and adopt the results in the Modified Table 3C for 2003 2006 for SCE, and 2006 for SDG&E, as the CRS applicable to MDL customers not exempt from the DWR Power Charge.

Respectfully submitted,

MICHAEL D. MONTOYA JANET S. COMBS

/s/ JANET S. COMBS

By: Janet S. Combs

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

On behalf of the Working Group Parties:

Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, The Utility Reform Network, Alliance for Retail Energy Markets, California Large Energy Consumers Association, City of Rancho Cucamonga, City of Corona, South San Joaquin Irrigation District, California Manufacturers & Technology Association

November 3, 2006

ATTACHMENT A

MODIFIED TABLE 3C

MODIFIED TABLE 3C

MDL CRS Accrual Rates (\$/MWh) 2003 - 2011

	, taopit	Adopted				Illustrative					
2003	2004	2005	2006	2007	2008	2009	2010	2011			
17.19	16.22	6.76	(12.88)	(8.87)	(3.60)	(1.74)	(1.22)	1.10			
	3.21	0.33	10.24	10.24	10.24	10.24	10.24	10.24			
17.19	13.01	6.43	(23.12)	(19.11)	(13.84)	(11.98)	(11.46)	(9.14)			
			(17.47)	(10.51)	20.34	18.08	12.66	35.84			
			, ,	,				3.52			
		_	(20.99)	(14.03)	16.82	14.56	9.14	32.32			
•											
	16.42	6.76	(12.88)	(8.87)	(3.60)	(1.74)	(1.22)	1.10			
	3.21	0.33	10.24	10.24	10.24	10.24	10.24	10.24			
_	13.21	6.43	(23.12)	(19.11)	(13.84)	(11.98)	(11.46)	(9.14)			
			(17.47)	(10.51)	20.34	18.08	12.66	35.84			
			, ,	, ,		3.52	3.52	3.52			
		-	(20.99)	(14.03)	16.82	14.56	9.14	32.32			
2003 CTC for	SCF The 2	= 004-2006	CTC is the a	innual system	average						
	17.19 17.19	17.19 16.22 3.21 17.19 13.01 16.42 3.21 13.21	17.19 16.22 6.76 3.21 0.33 17.19 13.01 6.43 16.42 6.76 3.21 0.33 13.21 6.43	17.19 16.22 6.76 (12.88) 3.21 0.33 10.24 17.19 13.01 6.43 (23.12) (17.47) 3.52 (20.99) 16.42 6.76 (12.88) 3.21 0.33 10.24 13.21 6.43 (23.12) (17.47) 3.52 (20.99)	17.19 16.22 6.76 (12.88) (8.87) 3.21 0.33 10.24 10.24 17.19 13.01 6.43 (23.12) (19.11) (17.47) (10.51) 3.52 3.52 (20.99) (14.03) 16.42 6.76 (12.88) (8.87) 3.21 0.33 10.24 10.24 13.21 6.43 (23.12) (19.11) (17.47) (10.51) 3.52 3.52 (20.99) (14.03)	17.19 16.22 6.76 (12.88) (8.87) (3.60) 3.21 0.33 10.24 10.24 10.24 17.19 13.01 6.43 (23.12) (19.11) (13.84) (17.47) (10.51) 20.34 3.52 3.52 3.52 (20.99) (14.03) 16.82 16.42 6.76 (12.88) (8.87) (3.60) 3.21 0.33 10.24 10.24 10.24 13.21 6.43 (23.12) (19.11) (13.84) (17.47) (10.51) 20.34 3.52 3.52 3.52	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	17.19 16.22 6.76 (12.88) (8.87) (3.60) (1.74) (1.22) 17.19 13.01 6.43 (23.12) (19.11) (13.84) (11.98) (11.46) (17.47) (10.51) 20.34 18.08 12.66 3.52 3.52 3.52 3.52 3.52 (20.99) (14.03) 16.82 14.56 9.14 16.42 6.76 (12.88) (8.87) (3.60) (1.74) (1.22) 3.21 0.33 10.24 10.24 10.24 10.24 10.24 13.21 6.43 (23.12) (19.11) (13.84) (11.98) (11.46) (17.47) (10.51) 20.34 18.08 (11.46) (17.47) (10.51) 20.34 18.08 12.66 3.52 3.52 3.52 3.52 3.52 (20.99) (14.03) 16.82 14.56 9.14			

ATTACHMENT B

SAMPLE SCE MDL CRS BILLING BASED UPON MODIFIED TABLE 3C

MDL CRS

(Not-Exempt from DWR Power Charge) Illustrative SCE Billing Methodology - 2004 Vintage

		Calculation		SCE								
Row	Description			2004		2005		2006	2004-2006 Obligation			
1	MDL Sales (MWhs) (Note 1)	Supplied by MDL		20,000		30,000		40,000				
	MDL CRS Accrual Rates (\$/MWh):											
2	Power Charge Indifference Adjustment (PCIA) (Notes 2, & 3)	Modified Table 3C	\$	13.21	\$	6.43	\$	(23.12)				
3	Competition Transition Charge (CTC)	Modified Table 3C		3.21		0.33		10.24				
4	Undercollection Elimination Adjustment (Notes 3 & 4)	D. 06-07-030		-		-		-				
5	Indifference Rate (Note 3)	[2] + [3] + [4]	\$	16.42	\$	6.76	\$	(12.88)				
6	DWR Bond Charge	DWR Revenue Requirement		4.93		4.59		4.85				
7	Total Rate	[5] + [6]	\$	21.35	\$	11.35	\$	(8.03)				
8	Obligation (\$)	[1] X [7]	\$	427,000	\$	340,500	\$	(321,200)	\$ 446	5,300		

Notes:

- New MDL customer agreed to receive load from the POU in 2003 and began receiving load in 2004.
- 2. Consistent with the timing set forth in D.06-06-067 the DWR power charge was renamed the PCIA.

- 3. D. 06-07-030 provides:
 (i) MDL CRS obligation shall be determined on a prospective basis in a manner consistent with the findings and directives in this decision;
 (ii) a negative indifference charge may be used to offset any existing positive CRS undercollection until such time as the CRS undercollection is eliminated for each IOU; and
- (iii) the indifference charge should remain nonnegative after the CRS undercollection is eliminated, and negative rates should not be used to offset other CRS components once past CRS undercollections have been paid off.

 4. As of December 31, 2006, the SCE DA CRS is expected to remain undercollected.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of WORKING GROUP PARTIES' PETITION FOR MODIFICATION OF DECISION 06-07-030, OPINION REGARDING DIRECT ACCESS AND DEPARTING LOAD COST RESPONSIBILITY SURCHARGE OBLIGATIONS on all parties identified on the attached service list. Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **3rd day of November**, **2006**, at Rosemead, California.

/s/ CHRISTINE SANCHEZ

Christine Sanchez
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

Friday, November 3, 2006

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD, CA 91770
R.02-01-011

MICHAEL ALCANTAR ATTORNEY AT LAW ALCANTAR & KAHL LLP 1300 SW FIFTH AVENUE, SUITE 1750 PORTLAND, OR 97201 R.02-01-011 Peter Arth, Jr.
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5300
SAN FRANCISCO, CA 94102-3214
R.02-01-011

JEANNE B. ARMSTRONG GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.02-01-011 Kathryn Auriemma CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4002 SAN FRANCISCO, CA 94102-3214 R.02-01-011 MICHAEL A. BACKSTROM ATTORNEY AT LAW SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.02-01-011

WILLIAM T. BAGLEY ATTORNEY AT LAW NOSSAMAN GUTHNER KNOX & ELLIOTT 50 CALIFORNIA STREET, 34TH FLOOR SAN FRANCISCO, CA 94111-4799 R.02-01-011

BARBARA R. BARKOVICH BARKOVICH & YAP, INC. 44810 ROSEWOOD TERRACE MENDOCINO, CA 95460 R.02-01-011 R. THOMAS BEACH CROSSBORDER ENERGY 2560 NINTH STREET, SUITE 213A BERKELEY, CA 94710 R.02-01-011

C. SUSIE BERLIN ATTORNEY AT LAW MC CARTHY & BERLIN, LLP 100 PARK CENTER PLAZA, SUITE 501 SAN JOSE, CA 95113 R.02-01-011 Christopher J. Blunt CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.02-01-011 SCOTT BLAISING ATTORNEY AT LAW BRAUN & BLAISING, P.C. 915 L STREET, STE. 1420 SACRAMENTO, CA 95814 R.02-01-011

WILLIAM BLATTNER SEMPRA ENERGY 601 VAN NESS AVENUE, SUITE 2060 SAN FRANCISCO, CA 94102 R.02-01-011 JERRY R. BLOOM ATTORNEY AT LAW WHITE & CASE 555 CALIFORNIA ST STE. 1000 SAN FRANCISCO, CA 94104-1513-4050 R 02-01-011 WILLIAM H. BOOTH ATTORNEY AT LAW LAW OFFICE OF WILLIAM H. BOOTH 1500 NEWELL STREET, 5TH FLOOR WALNUT CREEK, CA 94596 R.02-01-011

Jonathan Bromson CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4107 SAN FRANCISCO, CA 94102-3214 R.02-01-011

JUSTIN D. BRADLEY SILICON VALLEY LEADERSHIP GROUP 224 AIRPORT PARKWAY, SUITE 620 SAN JOSE, CA 95110 R.02-01-011 ANDREW B. BROWN ELLISON, SCHNEIDER & HARRIS, LLP 2015 H STREET SACRAMENTO, CA 95814 R.02-01-011

Friday, November 3, 2006

MAURICE BRUBAKER BRUBAKER & ASSOCIATES, INC. 1215 FERN RIDGE PARKWAY, SUITE 208 ST. LOUIS, MO 63141 R.02-01-011

JAMES E. BURKE 125 WAWONA ST. SAN FRANCISCO, CA 94127 R.02-01-011 JAMES H. BUTZ AIR PRODUCTS AND CHEMICALS, INC. 7201 HAMILTON BLVD. ALLENTOWN, PA 18195 R.02-01-011

DAVID J. BYERS ATTORNEY AT LAW MCCRACKEN, BYERS & HAESLOOP 1528 SO. EL CAMINO REAL, SUITE 306 SAN MATEO, CA 94402 R02-01-011

ANDREW CAMBELL 505 VAN NESS AVE. EXECUTIVE DIVISION RM 5304 SAN FRANCISCO, CA 94102 R.02-01-011 DAN L. CARROLL ATTORNEY AT LAW DOWNEY BRAND LLP 555 CAPITOL MALL, 10TH FLOOR SACRAMENTO, CA 95814 R.02-01-011

SEAN CASEY SAN FRANCISCO PUBLIC UTILITIES COMMISSIO 1155 MARKET STREET, 4TH FLOOR SAN FRANCISCO, CA 94103 R.02-01-011 CENTRAL FILES CENTRAL FILES SAN DIEGO GAS & ELECTRIC 8330 CENTURY PARK COURT SAN DIEGO, CA 92123-1530-1530 R02-01-011 ANDREW S. CHEUNG ASSISTANT GENERAL COUNSEL LOS ANGELES UNIFIED SCHOOL DISTRICT 333 S. BEAUDRY AVE., 20TH FLOOR LOS ANGELES, CA 90017 R02-01-011

Judy Cooper CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 2-E SAN FRANCISCO, CA 94102-3214 R.02-01-011 Kevin P. Coughlan CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4011 SAN FRANCISCO, CA 94102-3214 R.02-01-011 JANET S. COMBS LAW DEPARTMENT SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R02-01-011

JOSEPH PETER COMO CITY AND COUNTY OF SAN FRANCISCO 1 DR. CARLTON B. GOODLETT PLACE, RM. 234 Dennis Herrera and City & County of San Francisco SAN FRANCISCO, CA 94102 R.02-01-011

CHRISTOPHER CONKLING GENERAL COUNSEL USS-POSCO INDUSTRIES 900 LOVERIDGE ROAD PITTSBURG, CA 94565 R.02-01-011

THOMAS CORR SEMPRA ENERGY 101 ASH STREET, HQ 08 SAN DIEGO, CA 92101-3017 R.02-01-011

LISA A. COTTLE ATTORNEY AT LAW WINSTON & STRAWN, LLP 101 CALIFORNIA STREET, SUITE 3900 SAN FRANCISCO, CA 94111-5894 R 02-01-011 BRIAN T. CRAGG ATTORNEY AT LAW GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.02-01-011

TOM CROOKS NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.02-01-011

Friday, November 3, 2006

CHAD CURRAN ENERGY REVENUE REQUIREMENTS PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE STREET, RM. 978 SAN FRANCISCO, CA 94105 R.02-01-011

ROGER CURTIS MACY'S WEST 35 OFARELL STREET, 6TH FLOOR SAN FRANCISCO, CA 94102 R.02-01-011 Christopher Danforth
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.02-01-011

JOHN DALESSI NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.02-01-011 ANDREW DALTON COUNSEL, ENVIRON SAFETY & REGULATORY AFF VALERO ENERGY COMPANY PO BOX 696000 SAN ANTONIO, TX 78269-6000-2186 R02-01-011

MICHAEL J. DAPONDE ATTORNEY AT LAW PILLSBURY WINTHROP LLP 400 CAPITOL MALL, SUITE 1700 SACRAMENTO, CA 95814 R.02-01-011

KAY DAVOODI Navy Rate Intervention NAVY UTILITY RATES AND STUDIES OFFICE 1322 PATTERSON AVE, SE - BLDG 33 NAVAL FACILITIES ENGINEERING COMMAND WASHINGTON NAVY YARD, DC 20374-5018-5018 R.02-01-011

MICHAEL B. DAY ATTORNEY AT LAW GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.02-01-011 REGINA M. DEANGELIS ATTORNEY AT LAW CALIFORNIA PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4107 SAN FRANCISCO, CA 94102-3214 R.02-01-011

LISA DECARLO STAFF COUNSEL CALIFORNIA ENERGY COMMISSION 1516 9TH STREET MS-14 SACRAMENTO, CA 95814 R.02-01-011

BRIAN DELAMER CAPSTONE TURBINE CORPORATION 21211 NORDHOFF STREET CHATSWORTH, CA 91311 R.02-01-011 RALPH E. DENNIS DIRECTOR, REGULATORY AFFAIRS FELLON-MCCORD & ASSOCIATES 9960 CORPORATE CAMPUS DRIVE, STE 2000 LOUISVILLE, KY 40223 R.02-01-011

DAVE DIETRICH DAVIS ENERGY GROUP 123 C STREET DAVIS, CA 95616 R.02-01-011 Paul Douglas CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214-3214 R 02-01-011 DANIEL W. DOUGLASS ATTORNEY AT LAW DOUGLASS & LIDDELL 21700 OXNARD STREET, SUITE 1030 WOODLAND HILLS, CA 91367-8102 R.02-01-011

GORDON P. ERSPAMER ATTORNEY AT LAW MORRISON & FOERSTER 101 YGNACIO VALLEY ROAD, SUITE 450 WALNUT CREEK, CA 94596-8130 R.02-01-011

ANNE FALCON EES CONSULTING, INC. 570 KIRKLAND AVE KIRLAND, WA 98033 R.02-01-011 STEVEN D. FARKAS
PARAMOUNT PETROLEUM CORPORATION
14700 DOWNEY AVENUE
PARAMOUNT, CA 90723
R.02-01-011

Friday, November 3, 2006

Julie A Fitch CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE EXECUTIVE DIVISION ROOM 5203 SAN FRANCISCO, CA 94102-3214 R.02-01-011 LAW DEPARTMENT FILE ROOM LAW DEPT FILE ROOM PACIFIC GAS & ELECTRIC COMPANY PO BOX 7442 PO BOX 770000 MAILCODE B30A SAN FRANCISCO, CA 94120-7442 R02-01-011

BOB FINKELSTEIN ATTORNEY AT LAW THE UTILITY REFORM NETWORK 711 VAN NESS AVE., SUITE 350 SAN FRANCISCO, CA 94102 R.02-01-011

MICHEL PETER FLORIO SENIOR ATTORNEY THE UTILITY REFORM NETWORK (TURN) 711 VAN NESS AVENUE, SUITE 350 SAN FRANCISCO, CA 94102 R02-01-011 MATTHEW FREEDMAN ATTORNEY AT LAW THE UTILITY REFORM NETWORK 711 VAN NESS AVENUE, SUITE 350 SAN FRANCISCO, CA 94102 R.02-01-011

NORMAN J. FURUTA ATTORNEY AT LAW DEPARTMENT OF THE NAVY 333 MARKET ST. 10TH FLOOR SAN FRANCISCO, CA 94105-2195 R.02-01-011

David M. Gamson CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5214 SAN FRANCISCO, CA 94102-3214 R.02-01-011 PETE GARRIS CALIFORNIA DEPARTMENT OF WATER RESOURCES 3310 EL CAMINO AVENUE, SUITE 120 SACRAMENTO, CA 95821 R.02-01-011 DAN GEIS AGRICULTURAL ENERGY CONSUMERS ASSOC. 925 L STREET, SUITE 800 SACRAMENTO, CA 95814 R.02-01-011

JACQUELINE GEORGE
DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE. SUITE 120
CALIFORNIA ENERGY RESOURCES
SCHEDULING
SACRAMENTO, CA 95821
R.02-01-011

ROBERT B. GEX ATTORNEY AT LAW, DAVIS WRIGHT TREMAINE LLP ONE EMBARCADERO CENTER, SUITE 600 SAN FRANCISCO, CA 94111-3611 R.02-01-011

JENNY GLUZGOLD
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000, RM. 987 - B9A
PO BOX 770000, RM. 987 - B9A
SAN FRANCISCO, CA 94177
R.02-01-011

ROGER GOLDSTEIN PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 SAN FRANCISCO, CA 94177 R.02-01-011 HOWARD V. GOLUB NIXON PEABODY LLP TWO EMBARCADERO CENTER, STE. 2700 SAN FRANCISCO, CA 94111-3996 R.02-01-011 MARCO GOMEZ ATTORNEY AT LAW S.F. BAY AREA RAPID TRANSIT DISTRICT PO BOX 12688 OAKLAND, CA 94604-2688 R.02-01-011

JEFFREY E. GRAY SENIOR CORPORATE COUNSEL LOWE'S COMPANIES, INC. PO BOX 1111 NORTH WILKESBORO, NC 28656 R.02-01-011 STEVEN F. GREENWALD ATTORNEY AT LAW DAVIS WRIGHT TREMAINE, LLP 505 MONTGOMERY STREET, SUITE 800 SAN FRANCISCO, CA 94111-6533 R02-01-011 KAREN GRIFFIN EXECUTIVE OFFICE CALIFORNIA ENERGY COMMISSION 1516 9TH STREET, MS 39 SACRAMENTO, CA 95814 R.02-01-011

Friday, November 3, 2006

JOSE GUZMAN ATTORNEY AT LAW NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP 50 CALIFORNIA STREET, 34TH FLOOR SAN FRANCISCO, CA 94111-4799 R.02-01-011

Peter Hanson CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4104 SAN FRANCISCO, CA 94102-3214 R.02-01-011

DAN HALPERIN PG&E PO BOX 770000, B9A SAN FRANCISCO, CA 94177 R.02-01-011

PETER W HANSCHEN MORRISON & FOERSTER, LLP 101 YGNACIO VALLEY ROAD, SUITE 450 Agricultural Energy Consumers Assn. WALNUT CREEK, CA 94596-8130 R.02-01-011 GEORGE HANSON ASSISTANT GENERAL MANAGER CITY OF CORONA 730 CORPORATION YARD WAY CORONA, CA 92880 R.02-01-011 LYNN M. HAUG ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS, LLP 2015 H STREET SACRAMENTO, CA 95814-3109 R.02-01-011

GREGORY HEIERTZ IRVINE RANCH WATER DISTRICT 15600 SAND CANYON AVENUE IRVINE, CA 92619 R.02-01-011 CHRISTINE HENNING ALLIANCE POWER 3511 J STREET UPPER EAST SACRAMENTO, CA 95816 R.02-01-011 JOHN A. HIGLEY MANAGING PARTNER ENERGY AND ENVIRONMENTAL ENTERPRISES 1776 PEACHTREET, NW, SUITE 430S ATLANTA, GA 30309 R.02-01-011

CHRISTOPHER HILEN ATTORNEY AT LAW DAVIS, WRIGHT TREMAINE, LLP ONE EMBARCADERO CENTER, SUITE 600 SAN FRANCISCO, CA 94111 R.02-01-011 SETH HILTON ATTORNEY AT LAW MORRISON & FOERSTER LLP 101 YGNACIO VALLEY ROAD, SUITE 450 WALNUT CREEK, CA 94596-8130 R.02-01-011 MICHAEL H. HINDUS ATTORNEY AT LAW PILLSBURY WINTHROP LLP 50 FREMONT STREET SAN FRANCISCO, CA 94105 R02-01-011

Martin Homec CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4205 SAN FRANCISCO, CA 94102-3214 R.02-01-011

RENEE HOFFMAN CITY OF ANAHEIM 201 S. ANAHEIM BLVD., SUITE 902 ANAHEIM, CA 92805 R.02-01-011 PAUL V. HOLTON
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177-0001
R.02-01-011

LON W. HOUSE ENERGY ADVISOR ASSOCIATION OF CALIFORNIA WATER AGENCIES 4901 FLYING C ROAD WATER & ENERGY CONSULTING BLACK MESA TRUST AND TO'NIZH ONI'ANI' CAMERON PARK, CA 95682-9615 R.02-01-011

ROCKY HO FTI CONSULTING 353 SACRAMENTO STREET, SUITE 1800 SAN FRANCISCO, CA 94111 R.02-01-011 DAVID L. HUARD ATTORNEY AT LAW MANATT, PHELPS & PHILLIPS, LLP 11355 WEST OLYMPIC BOULEVARD LOS ANGELES, CA 90064 R.02-01-011

Friday, November 3, 2006

MARK R. HUFFMAN ATTORNEY AT LAW PACIFIC GAS AND ELECTRIC COMPANY PO BOX 7442 PO BOX 770000 SAN FRANCISCO, CA 94120 R.02-01-011

ELIZABETH WAGNE HULL DEPUTY CITY ATTORNEY CITY OF CHULA VISTA 276 FOURTH AVENUE CHULA VISTA, CA 91910 R.02-01-011 Louis M Irwin CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.02-01-011

MICHAEL JASKE CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET, MS-22 SACRAMENTO, CA 95814 R.02-01-011 MARC D. JOSEPH ATTORNEY AT LAW ADAMS BROADWELL JOSEPH & CARDOZO 601 GATEWAY BLVD., STE. 1000 SOUTH SAN FRANCISCO, CA 94080 R.02-01-011 BILL JULIAN ATTORNEY AT LAW OFFICE OF STATE SENATOR MARTHA ESCUTIA STATE CAPITOL, ROOM 5046 SACRAMENTO, CA 95814 R.02-01-011

EVELYN KAHL ATTORNEY AT LAW ALCANTAR & KAHL LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.02-01-011

KURT J. KAMMERER K. J. KAMMERER & ASSOCIATES PO BOX 60738 SAN DIEGO, CA 92166-8738 R.02-01-011 JEFF KASPAR
DEPUTY PORT DIRECTOR OF PROPERTY &
ENVIR
PORT OF STOCKTON
2201 W. WASHINGTON STREET
STOCKTON, CA 95203-2942
R02-01-011

RANDALL W. KEEN ATTORNEY AT LAW MANATT, PHELPS & PHILLIPS, LLP 11355 WEST OLYMPIC BLVD. Los Angeles Unified School District LOS ANGELES, CA 90064 R.02-01-011

CAROLYN KEHREIN ENERGY MANAGEMENT SERVICES 1505 DUNLAP COURT DIXON, CA 95620-4208 R.02-01-011 WENDY KEILANI SAN DIEGO GAS & ELECTRIC 8330 CENTURY PARK COURT, CP32D SAN DIEGO, CA 92123 R.02-01-011

Dexter E. Khoury
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.02-01-011

Robert Kinosian CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4205 SAN FRANCISCO, CA 94102-3214-3214 R.02-01-011

WENDELL KIDO 10545 ARMSTRONG AVENUE MATHER, CA 95655 R.02-01-011

ANGELA KIM FTI CONSULTING 353 SACRAMENTO STREET, SUITE 1800 SAN FRANCISCO, CA 94111 R.02-01-011 ANN H. KIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 3101
PO BOX 7442
SAN FRANCISCO, CA 94105
R.02-01-011

CHRIS KING
CALIFORNIA CONSUMER EMPOWERMENT
ALLIANCE
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
R.02-01-011

Friday, November 3, 2006

GREGORY S.G. KLATT ATTORNEY AT LAW--Wal-Mart Stores, Inc. DOUGLASS & LIDDELL 21700 OXNARD STREET, SUITE 1030 WOODLAND HILLS, CA 91367-8102 R.02-01-011

JAMES KOONTZ GRIFFITH & MASUDA 517 E. OLIVE STREET TURLOCK, CA 95380 R.02-01-011 Laura L. Krannawitter
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4101
SAN FRANCISCO, CA 94102-3214
R.02-01-011

Donald J. Lafrenz CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.02-01-011 GERALD LAHR ASSOCIATION OF BAY AREA GOVERNMENTS PO BOX 2050 OAKLAND, CA 94604-2050 R.02-01-011 DIANA LAI PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 MAIL CODE B9A SAN FRANCISCO, CA 94177 R.02-01-011

JOHN W. LESLIE ATTORNEY AT LAW LUCE, FORWARD, HAMILTON & SCRIPPS, LLP 11988 EL CAMINO REAL, SUITE 200 SAN DIEGO, CA 92130 R.02-01-011

DONALD C. LIDDELL DOUGLASS & LIDDELL 2928 2ND AVENUE SAN DIEGO, CA 92103 R.02-01-011 RONALD LIEBERT ATTORNEY AT LAW CALIFORNIA FARM BUREAU FEDERATION 2300 RIVER PLAZA DRIVE SACRAMENTO, CA 95833 R.02-01-011

KAREN LINDH LINDH & ASSOCIATES 7909 WALERGA ROAD, NO. 112, PMB119 CMTA ANTELOPE, CA 95843 R.02-01-011 LAWRENCE LINGBLOOM CONSULTANT SENATE ENERGY/UTILITIES & COMMUNICATION STATE CAPITOL, ROOM 4040 SACRAMENTO, CA 95814 R.02-01-011

BARRY LOVELL BERRY PETROLEUM COMPANY PO BOX 925 PO BOX 925 TAFT, CA 93268 R.02-01-011

LYNELLE LUND GENERAL COUNSEL COMMERCE ENERGY, INC. 600 ANTON BLVD., STE 2000 COSTA MESA, CA 92626 R02-01-011

WILLIAM B. MARCUS JBS ENERGY, INC. 311 D STREET, SUITE A WEST SACRAMENTO, CA 95605 R.02-01-011 MARTIN A. MATTES ATTORNEY AT LAW NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP 50 CALIFORNIA STREET, 34TH FLOOR Jack in the Box, Inc SAN FRANCISCO, CA 94111-4799 R.02-01-011

CHRISTOPHER MAYER MODESTO IRRIGATION DISTRICT PO BOX 4060 MODESTO, CA 95352-4060-4060 R.02-01-011 KEITH MC CREA ATTORNEY AT LAW SUTHERLAND, ASBILL & BRENNAN 1275 PENNSYLVANIA AVENUE, NW WASHINGTON, DC 20004-2415 R 02-01-011

RICHARD MCCANN M.CUBED 2655 PORTAGE BAY ROAD, SUITE 3 DAVIS, CA 95616 R.02-01-011

Friday, November 3, 2006

BARRY F MCCARTHY ATTORNEY AT LAW MCCARTHY & BERLIN, LLP 100 PARK CENTER PLAZA, SUITE 501 SAN JOSE, CA 95113 R.02-01-011 JEANNE MCKINNEY ATTORNEY AT LAW THELEN REID & PRIEST 101 SECOND STREET, SUITE 1800 SAN FRANCISCO, CA 94105 R.02-01-011

BRUCE MCLAUGHLIN BRAUN & BLAISING P.C. 8066 GARRYANNA DRIVE CITRUS HEIGHTS, CA 95610 R.02-01-011

JAMES MCMAHON SENIOR ENGAGEMENT MANAGER NAVIGANT CONSULTING, INC. 29 DANBURY RD NASHUA, NH 3064 R.02-01-011

MEG MEAL 120 JERSEY STREET SAN FRANCISCO, CA 94114 R.02-01-011 GARY A. MEYER A PROFESSIONAL CORPORATION PARKER,MILLIKEN,CLARK,O'HARA&SAMUEL IAN 333 SOUTH HOPE STREET, 27TH FLOOR LOS ANGELES, CA 90071-1488 R.02-01-011

KAREN NORENE MILLS ATTORNEY AT LAW CALIFORNIA FARM BUREAU FEDERATION 2300 RIVER PLAZA DRIVE SACRAMENTO, CA 95833 R.02-01-011

WILLIAM A. MOGEL 1025 THOMAS JEFFERSON STREET NW STE 425 WASHINGTON, DC 20007 R.02-01-011 MICHAEL MONTOYA SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.02-01-011

IRENE K. MOOSEN ATTORNEY AT LAW REGENTS OF UNIVERSITY OF CALIFORNIA 53 SANTA YNEZ AVENUE SAN FRANCISCO, CA 94112 R.02-01-011

TRACH L. MORGAN COMMERCE ENERGY/ELECTRICAMERICA 600 ANTON BLVD., STE. 2000 COSTA MESA, CA 92626 R.02-01-011 KELLY M. MORTON ATTORNEY AT LAW SAN DIEGO GAS & ELECTRIC 101 ASH STREET SAN DIEGO, CA 92123 R.02-01-011

JAMES MOSHER AREA ENERGY LLC 10000 MING AVENUE BAKERSFIELD, CA 93311 R.02-01-011 RICHARD MRLIK INTERTIE 2130 FILLMORE STREET, 211 SAN FRANCISCO, CA 94115 R.02-01-011 JACKSON W. MUELLER JACKSON W. MUELLER, JR., LLC 12450 235TH PLACE NE P.O. Box 6009 REDMOND, WA 98053 R.02-01-011

MARIC MUNN OFFICE OF THE PRESIDENT UNIVERSITY OF CALIFORNIA 1111 FRANKLIN STREET, 6TH FLOOR OAKLAND, CA 94607 R.02-01-011 SARA STECK MYERS ATTORNEY AT LAW LAW OFFICES OF SARA STECK MYERS 122 - 28TH AVENUE SAN FRANCISCO, CA 94121 R.02-01-011

RITA NORTON RITA NORTON AND ASSOCIATES, LLC 18700 BLYTHSWOOD DRIVE, LOS GATOS, CA 95030 R.02-01-011

Friday, November 3, 2006

EDWARD W. O'NEILL ATTORNEY AT LAW DAVIS WRIGHT TREMAINE LLP ONE EMBARCADERO CENTER, SUITE 600 SAN FRANCISCO, CA 94111-3834 R.02-01-011 PETER OUBORG ATTORNEY AT LAW PACIFIC GAS AND ELECTRIC COMPANY PO BOX 7442 MAIL CODE B30A SAN FRANCISCO, CA 94120 R.02-01-011 JOHN PACHECO
CALIFORNIA ENERGY RESOURCES
SCHEDULING
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821
R.02-01-011

RAJ N. PANKHANIA HERCULES MUNICIPAL UTILITY 111 CIVIC DRIVE HERCULES, CA 94547 R.02-01-011 MONA PATEL BROWN & WOOD LLP 555 CALIFORNIA STREET, 50TH FLOOR SAN FRANCISCO, CA 94104 R.02-01-011 COLIN L. PEARCE DUANE MORRIS & HECKSCHER 1 MARKET PLAZA, SPEAR TOWER, 20TH FLOOR SAN FRANCISCO, CA 94105 R.02-01-011

NORMAN A. PEDERSEN ATTORNEY AT LAW HANNA AND MORTON LLP 444 FLOWER STREET, SUITE 2050 LOS ANGELES, CA 90071 R.02-01-011 AMY PETERS REGULATORY CASE ADMINISTRATOR SAN DIEGO GAS AND ELECTRIC COMPANY 8330 CENTURY PARK COURT -CP32D SAN DIEGO, CA 92123-1530 R.02-01-011

LON L. PETERS PUBLIC GENERATING POOL 607 SE MANCHESTER PLACE PORTLAND, OR 97202-9006 R.02-01-011

SARA PICTOU EXECUTIVE ASSISTANT OAK CREEK ENERGY SYSTEMS, INC. 14633 WILLOW SPRINGS ROAD MOJAVE, CA 93501 R.02-01-011 EDWARD G. POOLE ATTORNEY AT LAW ANDERSON & POOLE 601 CALIFORNIA STREET, SUITE 1300 SAN FRANCISCO, CA 94108-2818 R02-01-011

Thomas R. Pulsifer CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5005 SAN FRANCISCO, CA 94102-3214 R.02-01-011

ERIN RANSLOW NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R02-01-011 CHARLES C. READ ATTORNEY AT LAW O'MELVENY & MYERS, LLP 400 SOUTH HOPE STREET LOS ANGELES, CA 90071 R 02-01-011 ROBERT REDLINGER CHEVRON ENERGY SOLUTIONS CHEVRON TEXACO 345 CALIFORNIA STREET, 32ND FLOOR SAN FRANCISCO, CA 94104 R.02-01-011

J. JASON REIGER CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5125 SAN FRANCISCO, CA 94102 R.02-01-011 Steve Roscow CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.02-01-011 STUART ROBERTSON ROBERTSON-BRYAN, INC, Central Valley Project Group 9888 KENT ST ELK GROVE, CA 95624-9483 R.02-01-011

Friday, November 3, 2006

MICHAEL ROCHMAN SCHOOL PROJECT UTILITY RATE REDUCTION 1430 WILLOW PASS ROAD, SUITE 240 CONCORD, CA 94520 R.02-01-011 HAROLD M. ROMANOWITZ CHIEF OPERATING OFFICER OAK CREEK ENERGY SYSTEMS, INC. 14633 WILLOW SPRINGS ROAD MOJAVE, CA 93501 R.02-01-011

JOHN ROSENBAUM WHITE & CASE LLP 4 EMBARCADERO CENTER, 24TH FLOOR SAN FRANCISCO, CA 94111 R.02-01-011

JAMES ROSS REGULATORY & COGENERATION SERVICES, INC. 500 CHESTERFIELD CENTER, SUITE 320 CHESTERFIELD, MO 63017 R.02-01-011 ROB ROTH SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S STREET MS 75 SACRAMENTO, CA 95817 R.02-01-011 DIANE RUNNING RESEARCH ANALYST EES CONSULTING, INC. 570 KIRKLAND WAY, SUITE 200 KIRKLAND, WA 98033-2471 R.02-01-011

STEVEN P. RUSCH STOCKER RESOURCES, INC. 5640 S. FAIRFAX LOS ANGELES, CA 90056 R.02-01-011 ROGER L. RUSSELL PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 SAN FRANCISCO, CA 94177 R.02-01-011 J.A. SAVAGE CALIFORNIA ENERGY CIRCUIT 3006 SHEFFIELD AVE. OAKLAND, CA 94602 R.02-01-011

WILLIAM P. SCHARFENBERG PAUL, HASTINGS, JANOFSKY & WALKER LLP 875 15TH STREET NW WASHINGTON, DC 20005 R 02-01-011 STEVEN S. SCHLEIMER
DIR. OF MARKET & REGULATORY AFFAIRS
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PO BOX 11749
PLEASANTON, CA 94588-1749
R.02-01-011

REED V. SCHMIDT BARTLE WELLS ASSOCIATES 1889 ALCATRAZ AVENUE California City-County Street Light Assoc. BERKELEY, CA 94703-2714 R.02-01-011

DONALD R. SCHOONOVER ATTORNEY AT LAW PACIFIC TELESIS GROUP 2600 CAMINO RAMON, 2W805 SAN RAMON, CA 94583 R.02-01-011 MICHAEL SHAMES ATTORNEY AT LAW UTILITY CONSUMERS' ACTION NETWORK 3100 FIFTH AVENUE, SUITE B SAN DIEGO, CA 92103 R 02-01-011 KAREN M SHEA CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.02-01-011

NORA E. SHERIFF ATTORNEY AT LAW ALCANTAR & KAHL LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R 02-01-011 JENNIFER SHIGEKAWA ATTORNEY AT LAW SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R02-01-011

KEVIN J. SIMONSEN ENERGY MANAGEMENT SERVICES 646 EAST THIRD AVE DURANGO, CO 81301 R.02-01-011

Friday, November 3, 2006

JUNE SKILLMAN CONSULTANT 2010 GREENLEAF STREET SANTA ANA, CA 92706 R.02-01-011 RALPH SMITH LARKIN & ASSOCIATES, INC. 15728 FARMINGTON ROAD LIVONIA, MI 48154 R.02-01-011 JAMES D. SQUERI ATTORNEY AT LAW GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.02-01-011

JOSEPH STAGNER
OPERATIONS AND MAINTENANCE
UNIVERSITY OF CALIFORNIA, DAVIS
ONE SHIELDS AVENUE
DAVIS, CA 95616
R.02-01-011

MERIDETH TIRPAK STERKEL CALIFORNIA PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.02-01-011

JOANNA STONE POOLE REAL ENERGY 6712 WASHINGTON ST YOUNTVILLE, CA 94599-1303-1303 R.02-01-011

PAUL A. SZYMANSKI ATTORNEY AT LAW SAN DIEGO GAS & ELECTRIC COMPANY 101 ASH STREET SAN DIEGO, CA 92101 R.02-01-011

PATRICIA THOMPSON SUMMIT BLUE CONSULTING 1766 LACASSIE AVE. STE 103 WALNUT CREEK, CA 94596 R.02-01-011 VICKI L. THOMPSON ATTORNEY AT LAW SAN DIEGO GAS & ELECTRIC COMPANY 101 ASH STREET HQ13 SAN DIEGO, CA 92101 R.02-01-011

SCOTT TOMASHEFSKY REGULATORY AFFAIRS MANAGER NORTHERN CALIFORNIA POWER AGENCY 180 CIRBY WAY NORTHERN CALIFORNIA POWER AGENCY ROSEVILLE, CA 95678 R 02-01-011

NANCY TRONNAS CALIFORNIA ENERGY COMMISSION 1516 9TH ST. MS-20 SACRAMENTO, CA 95814-5512 R.02-01-011 ANN L. TROWBRIDGE ATTORNEY AT LAW DOWNEY BRAND, LLP 555 CAPITOL MALL, 10TH FLOOR SACRAMENTO, CA 95814-4686 R.02-01-011

MARY TUCKER SUPERVISING SPECIALIST ENVIRONMENTAL SERVICES DEPARTMENT 777 N. 1ST STREET, SUITE 300 CITY OF SAN JOSE SAN JOSE, CA 95112-6351 R.02-01-011

TIM TUTT CALIFORNIA ENERGY COMMISSION 1516 9TH STREET, MS-45 SACRAMENTO, CA 95814 R.02-01-011 ANDREW ULMER CALIFORNIA DEPARTMENT OF WATER RESROURCE 3310 EL CAMINO AVENUE, SUITE 120 SACRAMENTO, CA 95821 R.02-01-011

ANDREW J. VAN HORN VAN HORN CONSULTING 12 LIND COURT ORINDA, CA 94563 R.02-01-011 Carlos A Velasquez CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.02-01-011 LEONARD VIEJO PRESIDENT ASTRUM UTILITY SERVICES 462 STEVENS AVE., SUITE 308 SOLANA BEACH, CA 92075 R.02-01-011

Friday, November 3, 2006

Ourania M. Vlahos CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5037 SAN FRANCISCO, CA 94102-3214 R.02-01-011

JOY WARREN MODESTO IRRIGATION DISTRICT 1231 11TH STREET MODESTO, CA 95354 R.02-01-011 LULU WEINZIMER CALIFORNIA ENERGY CIRCUIT 695 9TH AVE. NO.2 SAN FRANCISCO, CA 94118 R.02-01-011

ROBERT B. WEISENMILLER MRW & ASSOCIATES, INC. 1999 HARRISON STREET, SUITE 1440 OAKLAND, CA 94612 R.02-01-011 GREGGORY L. WHEATLAND ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS 2015 H STREET SACRAMENTO, CA 95814 R.02-01-011

EDWARD WHELESS COUNTY SANITATION DISTRICTS OF L.A. PO BOX 4998 WHITTIER, CA 90607 R.02-01-011

CHRIS WILLIAMSON BREITBURN ENERGY COMPANY, LLC 515 S. FLOWER STREET, SUITE 4800 LOS ANGELES, CA 90071 R.02-01-011 KEVIN WOODRUFF WOODRUFF EXPERT SERVICES 1100 K STREET, SUITE 204 SACRAMENTO, CA 95814 R.02-01-011 CYNTHIA WOOTEN NAVIGANT CONSULTING, INC. 1126 DELAWARE STREET BERKELEY, CA 94702 R.02-01-011

E. J. WRIGHT OCCIDENTIAL ENERGY MARKETING, INC. 5 GREENWAY PLAZA, SUITE 110 HOUSTON, TX 77046 R.02-01-011 Helen W. Yee CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5034 SAN FRANCISCO, CA 94102-3214 R.02-01-011 Amy C Yip-Kikugawa CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5135 SAN FRANCISCO, CA 94102-3214 R.02-01-011

ERIC YUSSMAN REGULATORY ANALYST FELLON-MCCORD & ASSOCIATES 9960 CORPORATE CAMPUS DRIVE LOUISVILLE, KY 40223 R.02-01-011

CALIFORNIA ENERGY MARKETS 517 B POTRERO AVENUE SAN FRANCISCO, CA 94110-1431 R.02-01-011